

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

C.A. NO. 04-CV-30076-KPN

LITCHFIELD FINANCIAL CORPORATION  
TEXTRON FINANCIAL CORPORATION  
LAND FINANCE COMPANY

Plaintiffs,

v.

BUYERS SOURCE REAL ESTATE GROUP  
BUYERS SOURCE VALLEY GROUP, LLC  
BUYERS SOURCE SUGARMILL, LLC  
BUYERS SOURCE, SAVANNAH LAKES, LLC  
THOMAS H. BREWER  
FREDERICK D. BLAKE  
BETTY M. BREWER  
SUSAN GARD  
HENRY MONTGOMERY  
LANNIE CAMPBELL  
RONALD P. FERGUSON  
STEPHEN A. HUDGINS, ESQ.  
STEPHEN A. HUDGINS, P.C.  
HUDGINS & STALLINGS, P.C.  
J. VANCE STALLINGS, ESQ.  
JOHN C. LUMPKIN, ESQ.  
JOHN C. LUMPKIN, P.C.  
WILLIAM GREGORY SEIGLER, ESQ.

Defendants.

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b) of the U.S. District Court for the District of Massachusetts, and the attached Certificate, the undersigned, a member in good standing of the bar of this Court, hereby moves for permission for Samuel Outten of the law firm of Womble Carlyle Sandridge & Rice, Poinsett Plaza, Suite 700, 104 South Main Street, Greenville, SC

29601, to appear pro hac vice and represent the defendant William Gregory Seigler ("Mr. Seigler") in this case. In support of this motion, the undersigned represents the following:

1. This action arises out of allegedly wrongful conduct by defendants Buyers Source Sugarmill, LLC, Buyers Source Savannah Lakes, LLC, Buyers Source Valley Group, LLC and others, with respect to the purchase of properties in South Carolina ("Savannah Lakes Project"), Sugarmill Woods, Florida, and Apple Valley, Ohio. Plaintiffs' Complaint alleges, inter alia, that Mr. Seigler delivered inaccurate legal opinions upon which plaintiffs relied. Plaintiffs have asserted negligent misrepresentation and legal malpractice counts against Mr. Seigler.
2. Samuel Outten, who is a member of the law firm of Womble Carlyle Sandridge & Rice, has been engaged by Mr. Seigler to represent him in a pending state court declaratory action in McCormick County, South Carolina, arising out of the Savannah Lakes Project. In the South Carolina action, Mr. Seigler seeks a Declaratory Judgment as to the propriety of the legal opinions he rendered, among other matters. Samuel Outten has a specialized knowledge of Mr. Seigler's affairs, the facts and circumstances leading up to this action, and the issues that are likely to be raised in this case.
3. Samuel Outten is admitted to practice in all South Carolina courts. He is also admitted to practice before the United States District Courts for South Carolina and the United States Court of Appeals for the Fourth Circuit. See Certificate of Samuel Outten ("Outten Certificate") at ¶¶1, 2.

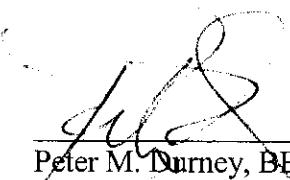
4. Samuel Outten is a member in good standing of the South Carolina Bar since 1985 and in every other court in which he is admitted. See Outten Certificate at ¶1.

5. Samuel Outten has no grievances or disciplinary proceedings pending against him in any Court in which he is admitted to practice. See Outten Certificate at ¶4.

6. Sam Outten has not been reprimanded, suspended, placed on inactive status, disbarred or ever resigned from the practice of law in any other Court. See Outten Certificate at ¶5.

WHEREFORE, the undersigned respectfully moves that this Court allow Samuel Outten to participate in this action pro hac vice.

Respectfully Submitted,  
Defendant,  
William Gregory Seigler,  
By his attorney,



Peter M. Durney, BBO #139260  
CORNELL & GOLLUB  
75 Federal Street  
Boston, MA 02110  
(617) 482-8100

CERTIFICATE OF SERVICE

I, Peter M. Durney, attorney for the defendant, William Gregory Seigler, hereby certify that on this 13<sup>th</sup> day of August, 2004, a true copy of the foregoing Motion for Admission Pro Hac Vice, was served by mail, postage prepaid, directed to:

Jeffrey L. McCormick, Esq.  
Robinson Donovan, P.C.  
1500 Main Street, Suite 1600  
Springfield, MA 01115

George R. Moore, Esq.  
Devine, Millimet & Branch, PA  
300 Brickstone Square, 9<sup>th</sup> Floor  
P.O. Box 39  
Andover, MA 01810

Ronald P. Ferguson  
6395 Lake View Drive  
Falls Church, VA 22041

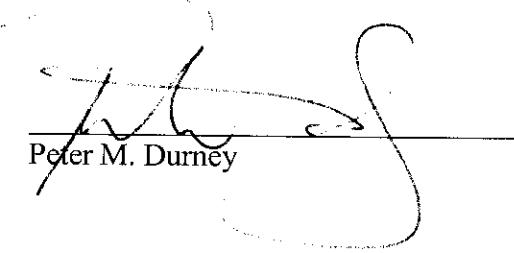
Henry Montgomery  
396 Baldwin Drive  
Howard, OH 43028-8044

Thomas H. Brewer  
113 Northgate Lane  
Suffolk, VA 23434

Betty M. Brewer  
113 Northgate Lane  
Suffolk, VA 23434

Frederick D. Blake  
705 Mobjack Place  
Newport News, VA 23606

Lannie L. Campbell  
One Harbor Court, #3D  
Portsmouth, VA 23704



Peter M. Durney

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J. VANCE STALLINGS, ESQ.  
JOHN C. LUMPKIN, ESQ.  
JOHN C. LUMPKIN, P.C.  
WILLIAM GREGORY SEIGLER, ESQ.

Defendants.

**CERTIFICATE OF SAMUEL OUTTEN**

I, Samuel Outten, Esquire, declare that:

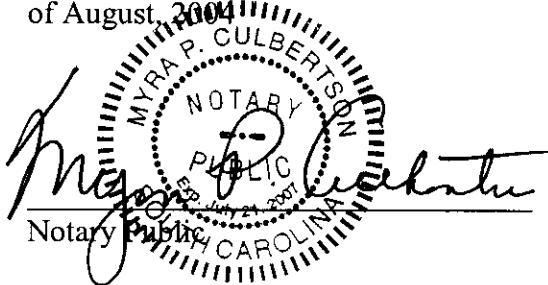
1. I am admitted to practice in all South Carolina courts and have been a member in good standing of the South Carolina Bar since 1985 and in every other court in which I am admitted.

2. I am also admitted to practice before the United States District Courts for South Carolina and the United States Court of Appeals for the Fourth Circuit.
3. I am a member of the law firm of Womble Carlyle Sandridge & Rice, Poinsett Plaza, Suite 700, 104 South Main Street, Greenville, SC 29601.
4. There are no grievances or disciplinary proceedings pending against me in any jurisdiction.
5. I have never been reprimanded, suspended, placed on inactive status, disbarred nor resigned from the practice of law in any jurisdiction.
6. I am familiar with the jurisdictional provisions of Title 28 U.S.C., the Federal Rules of Civil Procedure, and the Local Rules of this Court.
7. Accordingly, it is respectfully requested that the application to permit me to appear pro hac vice be granted.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on August, 12 2004.

Samuel V. Outten  
Samuel Outten

Sworn to before me this 12<sup>th</sup> day  
of August, 2004

  
Myra P. CULBERTSON  
NOTARY  
PUBLIC  
STATE OF SOUTH CAROLINA  
Notary Public